

FILED

SEP 30 2020

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY MS, DEPUTY

Antone Lamandingo Knox

Alisha/Ka Lamandingo-EI.

A.C.E./NATIONAL LAWYER GUILD-member  
(Enter the full name of the plaintiff.)

v.

Case No. CIV-20-988-PRW  
(Court Clerk will insert case number)

- (1) MARK Bowen, Dep/Lt Admin/Lawyer,
- (2) SCOTT CROW, D.D.C. Director,
- (3) UNKNOWN Dep/Lt officials, et al.

(Enter the full name of each defendant. Attach additional sheets as necessary.)

"Under Imminent Danger of Serious Physical Injury"  
**PRO SE PRISONER CIVIL RIGHTS COMPLAINT**

Initial Instructions

1. You must type or legibly handwrite the Complaint, and you must answer all questions concisely and in the proper space. Where more space is needed to answer any question, you may attach a separate sheet.
2. You must provide a full name for each defendant and describe where that defendant resides or can be located.
3. You must send the original complaint and one copy to the Clerk of the District Court.
4. You must pay an initial fee of \$400 (including a \$350 filing fee and a \$50 administrative fee). The complaint will not be considered filed until the Clerk receives the \$400 fee or you are granted permission to proceed *in forma pauperis*.
5. If you cannot prepay the \$400 fee, you may request permission to proceed *in forma pauperis* in accordance with the procedures set forth in the Court's form application to proceed *in forma pauperis*. See 28 U.S.C. § 1915; Local Civil Rule 3.3.

(page 2 of 8)

- If the court grants your request, the \$50 administrative fee will not be assessed and your total filing fee will be \$350.
- You will be required to make an initial partial payment, which the court will calculate, and then prison officials will deduct the remaining balance from your prison accounts over time.
- These deductions will be made until the entire \$350 filing fee is paid, regardless of how the court decides your case.

7. The Court will review your complaint before deciding whether to authorize service of process on the defendants. See 28 U.S.C. §§ 1915(e)(2), 1915A; 42 U.S.C. § 1997e(c)(1). If the Court grants such permission, the Clerk will send you the necessary instructions and forms.

8. If you have been granted permission to proceed *in forma pauperis*, the United States Marshals Service will be authorized to serve the defendants based on information you provide. If you have not been granted permission to proceed *in forma pauperis*, you will be responsible for service of a separate summons and copy of the complaint on each defendant in accordance with Rule 4 of the Federal Rules of Civil Procedure.

### COMPLAINT

#### **I. Jurisdiction is asserted pursuant to:**

✓ 42 U.S.C. § 1983 and 28 U.S.C. § 1343(a)(3) (NOTE: these provisions generally apply to state prisoners), or

Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971), and 28 U.S.C. § 1331 (NOTE: these provisions generally apply to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

(1) THE COURT HAS SUPPLEMENTAL JURISDICTION OVER PLAINTIFF'S STATE LAW CLAIMS UNDER 28 U.S.C. 1367; (2) PLAINTIFF'S CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY 28 U.S.C. SECTIONS 2283 & 2284 & RULE 65 F.R.C.P.,

**II. State whether you are a:**

- ☒ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner  
☐ Pretrial detainee  
☐ Immigration detainee  
☐ Civilly committed detainee  
☐ Other (please explain) \_\_\_\_\_

**III. Previous Federal Civil Actions or Appeals**

List each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility.

**1. Prior Civil Action/Appeal No. 1**

**a. Parties to previous lawsuit:**

Plaintiff(s): ANTHONY LAM AND INGOLD KNOX

Defendant(s): TOMMY SHARP, B.S.P. WARDEN; SCOTT CROW

DDOC, DIA, KEVIN STITT, GOVERNOR; DONALD J. TRUMP, PRESIDENT, & B.S.P. WARDEN OF ILLINOIS, ET AL

b. Court and docket number: U.S. Eastern District of NY, DC, no. CV-20-139-RAW-JR

c. Approximate date of filing: APRIL 2020

d. Issues raised: (A), 8th Amend. violations exposure to Covid-19, HIV; (B) Under Imminent Danger of physical injury; (C), Indifferent to a serious medical need etc.

e. Disposition (for example: Did you win? Was the case dismissed? Was summary judgment entered against you? Is the case still pending? Did you appeal?): THE CASE IS STILL PENDING SPECI-

ALLY TRANSFERRED FROM THE U.S. WESTERN DIST. OF OKLA COURT ETC.

f. Approximate date of disposition: STILL PENDING

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on a separate sheet(s).

#### IV. Parties to Current Lawsuit

State information about yourself and each person or company listed as a defendant in the caption (the heading) of this complaint.

1. Plaintiff

Antone Lamarding Knox,

Name and any aliases: ALISHA I. mandingzulu - E1,  
#191626 - A.C.E./N.L.G. member

Address: GEO/Lawton Corr. Facility, 8607 S.E.  
Flower Mound Road

Inmate No.: 191626

2. Defendant No. 1

Name and official position: MARK BOWEN, Administe-  
ATOR/Warden for GEO/LCF

Place of employment and/or residence: GEO/LCF, 8607 S.E., Flow-  
er Mound Road, Lawton, OK 73501-9765

How is this person sued? ☒ official capacity, ☒ individual capacity, ☐ both

3. Defendant No. 2

Name and official position: SCOTT CROW, DIRECTOR  
of D.D.D.C.

Place of employment and/or residence: D.D.D.C., 3400 Martin  
Luther King, P.O. Box 11400, OKC, OK 73136-  
0400

How is this person sued? ☒ official capacity, ☒ individual capacity, ☐ both

If there are more than two defendants, describe the additional defendants using this same format on a separate sheet(s).

**V. Cause of Action**

**Instructions**

1. *Provide a short and plain statement of each claim.*
  - Describe the facts that are the basis for your claim.
  - You can generally only sue defendants who were directly involved in harming you. Describe how each defendant violated your rights, giving dates and places.
  - Explain how you were hurt and the extent of your injuries.
2. *You are not required to cite case law.*
  - Describe the constitutional or statutory rights you believe the defendant(s) violated.
  - At this stage in the proceedings, you do not need to cite or discuss any case law.
3. *You are not required to attach exhibits.*
  - If you do attach exhibits, you should refer to the exhibits in the statement of your claim and explain why you included them.
4. *Be aware of the requirement that you exhaust prison grievance procedures before filing your lawsuit.*
  - If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. See 42 U.S.C. § 1997e(a).
  - Every claim you raise must be exhausted in the appropriate manner.
5. *Be aware of any statute of limitations.*
  - If you are suing about events that happened in the past, your case may be subject to dismissal under the statute of limitations. For example, for many civil rights claims, an action must be brought within two years from the date when the plaintiff knew or had reason to know of the injury that is the basis for the claim.

(page 6 of 8)

6. Do not include claims relating to your criminal conviction or to prison disciplinary proceedings that resulted in loss of good time credits.
- If a ruling in your favor "would necessarily imply the invalidity" of a criminal conviction or prison disciplinary punishment affecting the time served, then you cannot make these claims in a civil rights complaint unless you have already had the conviction or prison disciplinary proceeding invalidated, for example through a habeas proceeding.

### Claims

List the federal right(s) that you believe have been violated, and describe what happened. Each alleged violation of a federal right should be listed separately as its own claim.

#### 1. Claim 1:

- (1) List the right that you believe was violated:

8th Amendment Violation being further  
Exposed to COVID-19, VIRUS, AND Ignored

- (2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

I WAS ON Sept 2, 2020 AT ORDER OF  
DDDC-DIR J. CROW TO PRIVATE GEO/LET  
WARDEN/ADMIN' M. BOWEN WHOM ACCEP-  
TED ME AT THIS PRISON KNOWING  
THAT STAFF/INMATES/PRISONERS IS AFF-  
ECTED AND TESTED POSITIVE COVID-19,  
VIRUS KNOWING I GOT A ALREADY PENDING  
LAW SUIT IN U.S. E.D. COURT OF OKLA. ON COVID  
19, VIRUS ON D.D.C. OFFICIALS & DDC OFFICIALS  
WHEN I SUPPOSE TO BE SENT TO  
HAVE BEEN SENT TO A MINIMUM PRISON WHEN  
ELIGIBLE A MEDIUM PRISON WITH NO COVID-19



(page 7 of 8)

(3) List the supporting facts:

Joint Conspiracy by DDC Dir. & Geo/Lef Admin/Warden et al. to expose me at prevent & future Covid-19, view as a African, whom is 47 years old with high blood pressure & been exposed to T.B. view etc.

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

(1) Punitive Damages of \$500,000; (2) \$50,000 Compensatory; (3) \$100,000 in emotional & pain and suffering; (4) T.R.B./ Injunctive Relief; (5) Demand a speedy Trial/Trial 7th Amend;

2. Claim II:

(1) List the right that you believe was violated:

8th Amendment: Deliberate Indifference, when DDC Dir. & Geo/Lef Warden is very much AWARE since Dec 2019 thru Sept 2020 etc. That 70% of African's whom is exposed to Covid-19, view die from it according to

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

see attach/ enclosed memorandum C.R.C. Dir. & Geo/Lef + Redford et al.

Dated Sept 24, 2020 by Admin/Warden M. Bowen of the increase cases of Covid-19, view at Geo/Lef and both DDC-Dir. S. Crow and Geo/Lef Warden M. Bowen, is AWARE of the Covid-19, view when I arrived at Lef/Geo on Sept 2, 2020 due to it was lockdown due to Covid-19. And I been denied any medical treatment etc.

note: The DOC DIR. V. Crew, And DIR II m. Embrey - neo

ton et al. But the neo LCF warden m. Bowen et al. Since Sept 2, 2020 denying me (6) six month statement report to etc. to my inferior superior to this court etc

List the supporting facts: Joint conspiracy by DOC DIR & neo LCF

Admon/warden, et al. to expose me at present & future Covid-19 virus as a African

whom is 47 years old with high blood pressure & been exposed to T.B. Virus etc and will die of Covid-19

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

(1) Punitive Damages of \$500,000; (2) \$50,000 compensatory; (3) \$100,000 in emotional & pain & suffering; (4) T.R.O./Injunctive Relief; (5)

Demand a speedy jury trial 7th Amend. (6) I be immediately transferred to a minimum prison

If there are more than two claims that you wish to assert, describe the additional claims using this same format on a separate sheet(s).

for release on leg monitor instead of waiting till Jan 2021 when allowed to go to minimum

#### VI. Declarations

I declare under penalty of perjury that the foregoing is true and correct.

28 U.S.C. sec 1746, 18 U.S.C. sec 1621

Alishaka I. mandingzulu-EI med. prison

Antione Lamardings Knox Sept 28, 2020  
Plaintiff's signature A.C.E./N.L. G. member Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 28 day of Sept, 2020

Antione Lamardings Knox

Alishaka I. mandingzulu-EI Sept 28, 2020  
Plaintiff's signature A.C.E./N.L. G. member Date